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October 31, 2014

Sent via ECF

Honorable Faith S. Hochberg
United States District Court
U.S. Post Office & Court House Building
Room 311
P.O. Box 999
Newark, N.J. 07101-0999

Re: U.S.A v. Joseph Wolfson, et al.
Criminal No. 2:13-cr-748-FSH
Our File No. 13,113

Dear Judge Hochberg:

We represent defendants Joseph Wolfson, Richard Simon Trustee, and Betty Simon Trustee, LLC. On March 26, 2014, Your Honor requested that defendants advise the Court whether they needed an extension of time to review the government's 2.5 million documents of discovery by November 1, 2014. The current deadline for review of the discovery is December 31, 2014.

On November 15, 2014, we made our request for an extension to Judge Michael Hammer at an in-person hearing. Mr. Olejar joined in our request. Both Mr. Olejar and I represented to Judge Hammer that we would require an extension of at least 90 days and explained the reasons for our request on the record. Defense counsel hopes to resolve this issue when we appear before Judge Hammer on November 3, 2014.

Respectfully,
JACOBS & BARBONE, P.A.

/s/ Edwin J. Jacobs, Jr.
Edwin J. Jacobs, Jr., Esquire
Michael F. Myers, Esquire

cc: All counsel
cc: Joseph Wolfson